

EXHIBIT A



**J.P. WARD
& ASSOCIATES, LLC**
PITTSBURGH • PHILADELPHIA

201 S HIGHLAND AVE., STE 201
PITTSBURGH, PA 15206

JOSHUA P. WARD, ESQ.

412.545.3016 OFFICE
412.540.3399 FAX
Info@JPWARD.COM

November 2, 2021

SENT VIA CERTIFIED MAIL

Jefferson Capital Systems, LLC
16 McLeland Road
Saint Cloud, MN 56303

Re: Elisa Perez v. Jefferson Capital Systems, LLC; Docket No.: AR-21-004567
(Complaint in Civil Action)

To Whom It May Concern,

Enclosed, please find Plaintiff's Complaint in Civil Action in the above captioned matter. Thank you for your time and attention to this matter, please feel free to contact us if you have any questions or concerns.

Very truly yours,

A handwritten signature in blue ink that reads "Kyle H. Steenland".

Kyle H. Steenland, Esq.
ksteenland@jpward.com
Phone: (412) 651-8278

Enclosure(s): 1

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

ELISA PEREZ,

Plaintiff,

vs.

JEFFERSON CAPITAL SYSTEMS, LLC,

Defendant.

CIVIL DIVISION

ELECTRONICALLY FILED

Case No. AR-21-004567

COMPLAINT IN CIVIL ACTION

Filed on Behalf of Plaintiff:
Elisa Perez

Counsel of Record for this Party:
J.P. WARD & ASSOCIATES, LLC

Joshua P. Ward
Pa. I.D. No. 320347

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Telephone: (412) 545-3015
Fax No.: (412) 540-3399
E-mail: jward@jpward.com

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. If you do not have a lawyer, go to or telephone the office set forth below. This office can provide you with information about hiring a lawyer. **IF YOU CANNOT AFFORD TO HIRE A LAWYER**, this office may be able to provide you with information about agencies that may offer legal service to eligible persons at a reduced fee or no fee:

LAWYER REFERRAL SERVICE
11TH FLOOR KOPPERS BUILDING,
436 SEVENTH AVENUE
PITTSBURGH, PENNSYLVANIA 15219
TELEPHONE: (412) 261-5555

HEARING NOTICE YOU HAVE BEEN SUED IN COURT. The above Notice to Defend explains what you must do to dispute the claims made against you. If you file the written response referred to in the Notice to Defend, a hearing before a board of arbitrators will take place in the Compulsory Arbitration Center. Report to the Arbitration Assembly Room, Courtroom Two, Seventh Floor City-County Building, 414 Grant Street, Pittsburgh, Pennsylvania 15219, on **January 4, 2022, at 9:00 A.M.**

IF YOU FAIL TO FILE THE RESPONSE DESCRIBED IN THE NOTICE TO DEFEND, A JUDGMENT FOR THE AMOUNT CLAIMED IN THE COMPLAINT MAY BE ENTERED AGAINST YOU BEFORE THE HEARING. DUTY TO APPEAR AT ARBITRATION HEARING IF ONE OR MORE OF THE PARTIES IS NOT PRESENT AT THE HEARING, THE MATTER MAY BE HEARD AT THE SAME TIME AND DATE BEFORE A JUDGE OF THE COURT WITHOUT THE ABSENT PARTY OR PARTIES. THERE IS NO RIGHT TO A TRIAL DE NOVO ON APPEAL FROM A DECISION ENTERED BY A JUDGE.

NOTICE: You must respond to this complaint within twenty (20) days or a judgment for the amount claimed may be entered against you before the hearing. If one or more of the parties is not present at the hearing, the matter may be heard immediately before a judge without the absent party or parties. There is no right to a trial de novo on appeal from a decision entered by a judge.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

ELISA PEREZ,

Plaintiff,

vs.

JEFFERSON CAPITAL SYSTEMS, LLC,

Defendant.

CIVIL DIVISION

ELECTRONICALLY FILED

Case No. AR-21-004567

COMPLAINT

AND NOW, comes Plaintiff, Elisa Perez, by and through the undersigned counsel, J.P. Ward & Associates, LLC and, specifically, Joshua P. Ward, Esquire, who files the within Complaint in Civil Action against Defendant, Jefferson Capital Systems, LLC, of which the following is a statement:

PARTIES

1. Plaintiff, Elisa Perez (hereinafter "Elisa Perez"), is an adult individual who currently resides at 10 S. Prince St, Apt 508, Lancaster, Pennsylvania 17603.

2. Defendant, Jefferson Capital Systems, LLC, (hereinafter "Jefferson Capital Systems"), is a corporation with its principal place of business located at 16 McLeland Road, St. Cloud, Minnesota 56303.

JURISDICTION AND VENUE

3. Jurisdiction is proper as Plaintiff brings this lawsuit under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter, the "FDCPA").

4. Venue is proper pursuant to Pa.R.C.P. 2179(a)(2) because Defendant regularly conducts business in Allegheny County, Pennsylvania, and because Defendant is subject to general jurisdiction of Allegheny County, Pennsylvania.

PROCEDURAL HISTORY AND FACTUAL ALLEGATIONS

5. On September 29, 2020, Jefferson Capital Systems, filed a Civil Complaint against Elisa Perez in Magisterial District Court at Docket Number: MJ-02101-CV-0000087-2020. A true and correct copy of the Docket is attached hereto, made a part hereof, and marked as Exhibit "A".

6. In response to the aforesaid lawsuit, Elisa Perez engaged The Law Firm of Fenters Ward for representation.

7. On October 28, 2020, The Law Firm of Fenters Ward served Jefferson Capital Systems with a letter, (hereinafter, the "First Dispute Letter") wherein Jefferson Capital Systems was informed of the disputed nature regarding the alleged debt and that Elisa Perez was represented by counsel. A true and correct copy of the First Dispute Letter is attached hereto, made a part hereof, and marked as Exhibit "B".

8. This First Dispute Letter specifically stated that Elisa Perez **"denie[d] owing Jefferson Capital Systems, LLC any amount of money"** and informed Jefferson Capital Systems, LLC that Elisa Perez **disputed any and all "Debts"** Jefferson Capital Systems claimed to possess. See Exhibit "B".

9. **"Debts" as defined within the First Dispute Letter delineated and included "any related debt(s) and/or credit account(s) your company [Jefferson Capital Systems] claims to have, sold, purchased and/or assigned from yourself, another creditor, debt buyer or other entity as of the date of this letter. See Exhibit "B".**

10. Within the First Dispute Letter, The Law Firm of Fenters Ward demanded **"proof** of liability, accounting and ownership of these alleged accounts. The proof shall include any agreements and amendments thereto, any other written or signed documents agreed to by my client, as well as a complete history of billing statements reflecting how you calculated the current

amount claimed, owed, reported to the collection and/or credit agencies and complete copies of any assignment documentation evidencing your ownership rights to the specific accounts.” See Exhibit “B”.

11. Following the First Dispute Letter, Jefferson Capital Systems possessed a duty to reflect the disputed nature of any and all tradelines associated with Elisa Perez and to communicate said disputed nature to any and all credit reporting agencies.

12. Furthermore, Jefferson Capital Systems was directed to cease and desist from contacting Elisa Perez directly. See Exhibit “B”.

13. On October 28, 2020, The Law Firm of Fenters Ward filed an Entry of Appearance and an Intent to Defend on Elisa Perez’s behalf. True and correct copies of the Entry of Appearance and Notice of Intent to Defend are attached hereto, made a part hereof, and marked as Exhibit “C”.

14. On November 23, 2020, a Civil Action Hearing was held before the Honorable Adam J. Witkonis, Magisterial District Judge. See Exhibit “A”.

15. On November 23, 2020, at the conclusion of the Civil Action hearing, Judge Adam J. Witkonis granted a JUDGMENT FOR DEFENDANT in favor of Elisa Perez and against Jefferson Capital Systems. A true and correct copy of the Notice of Judgment is attached hereto, made a part hereof, and marked as Exhibit “D”.

16. On December 23, 2020, Jefferson Capital Systems’ appeal period expired, making Judge Adam J. Watkins’s JUDGMENT FOR DEFENDANT a final judgment: rendering the alleged debt extinguished, invalid, and unenforceable.

17. Following the First Dispute Letter, Jefferson Capital Systems had a duty to report the disputed nature of any and all tradelines associated with Elisa Perez.

18. On February 27, 2021, Jefferson Capital Systems caused false and inaccurate information about Elisa Perez to be furnished to TransUnion as Jefferson Capital Systems “updated” a tradeline associated with a disputed debt possessing an alleged balance of \$372.00. A true and correct copy of the tradeline is attached hereto, made a part hereof, and marked as Exhibit “E”.

19. Jefferson Capital Systems reported the abovementioned tradeline as “Remarks: >PLACED FOR COLLECTION<” and “Pay Status: >In Collection<”. See Exhibit “E”.

20. This furnished information associated with the alleged and disputed debt controverted the disputed nature of the alleged debt and purported the alleged debt to be undisputed.

21. Therefore, Jefferson Capital Systems falsely represented the character and legal status of the alleged and disputed debt in violation of 15 U.S.C. § 1692e(2)(a) of the FDCPA.

22. Upon falsely and inaccurately representing the character and legal status of the alleged and disputed debt, Jefferson Capital Systems communicated credit information which is known or which should be known to be false in violation of 15 U.S.C. § 1692e(8) of the FDCPA.

23. Furthermore, Jefferson Capital Systems failed to report the disputed nature of the tradeline associated with the alleged and disputed debt in violation of 15 U.S.C. § 1692e(8) of the FDCPA.

COUNT I
VIOLATIONS OF THE FDCPA, 15 U.S.C. § 1692, et seq.

24. Plaintiff incorporates the allegations contained in the paragraphs, above, as if fully set forth at length herein.

25. There is abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the

number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy. 15 U.S.C. 1692(a).

26. The purpose of the FDCPA is to **“eliminate abusive debt collection practices by debt collectors, to ensure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote consistent State action to protect consumers against debt collection abuses.”** 15 U.S.C. § 1692(e).

27. Elisa Perez is a “consumer” as defined by § 1692a(3) of the FDCPA.

28. Jefferson Capital Systems is a **“debt collector”** as defined by § 1692a(6) of the FDCPA.

29. Upon information and belief, the alleged “debt” arises out of an alleged transaction entered into primarily for personal, family, or household purposes. “The term ‘debt’ means any obligation or alleged obligation of a consumer to pay money arising out of a transaction in which the money, property, insurance, or services which are the subject of the transaction are primarily for personal, family, or household purposes, whether or not such obligation has been reduced to judgment.” 15 U.S.C. § 1692a(5).

30. The Third Circuit has held that the FDCPA is to be enforced by private attorney generals. *Weiss v. Regal Collections*, 385 F.3d 337, 345 (3d. Cir. 2004).

31. Section 1692e of the FDCPA provides:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section: (2) The false representation of – (A) the character, amount, or legal status of any debt; (8) Communicating or threatening to communicate to any person credit information which is known or which should be known to be false, including the failure to communicate that a disputed debt is disputed.

15 U.S.C. § 1692e of the FDCPA.

32. On October 28, 2020, The Law Firm of Fenters Ward served Jefferson Capital Systems with the First Dispute Letter wherein Jefferson Capital Systems was informed of the disputed nature regarding any and all alleged debts associated with Elisa Perez. See Exhibit “B”.

33. Following the First Dispute Letter, Jefferson Capital Systems possessed a duty to reflect the disputed nature of any and all tradelines associated with Elisa Perez and to communicate said disputed nature to any and all credit reporting agencies.

34. On February 27, 2021, Jefferson Capital Systems furnished information to TransUnion regarding a disputed debt possessing an alleged balance of \$372.00.

35. Jefferson Capital Systems reported that the tradeline associated with the alleged and disputed debt was “Remarks: >PLACED FOR COLLECTION<” and “Pay Status: >In Collection<.” See Exhibit “E”.

36. This communication of credit information associated with the alleged and disputed debt controverted its disputed nature and thereby constituted a false representation of the character and legal status of the alleged debt in violation of 15 U.S.C. § 1692e(2)(a) of the FDCPA.

37. By falsely and inaccurately representing the character and legal status of the alleged and disputed debt, Jefferson Capital Systems thereby communicated credit information which is known or which should be known to be false and thus violated 15 U.S.C. § 1692e(8) of the FDCPA.

38. In the abovementioned report, Jefferson Capital Systems failed to report the disputed nature of the tradeline associated with the alleged and disputed debt in further violation of 15 U.S.C. § 1692e(8) of the FDCPA. See Exhibit “E”.

39. Section 1692d of the FDCPA provides, in relevant part: **“A debt collector may not engage in any conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt.”**

40. Here, the only natural consequence of Jefferson Capital **Systems’** acts of willfully communicating credit information which was known to be false was to harass, oppress, and abuse Elisa Perez.

41. As such, Jefferson Capital **Systems’** conduct, as set forth above, violated 15 U.S.C. § 1692d of the FDCPA.

42. Section 1692k(a) of the FDCPA provides, in relevant part:

...any debt collector who fails to comply with any provision of this subchapter with respect to any person is liable to such person in an amount equal to the sum of – (1) any actual damages sustained by such person as the result of such failure; (2)(A) in the case of any action by an individual, such additional damages as the court may allow, but not exceeding \$1,000; and (3) in the case of any successful action to enforce the foregoing liability, the costs of the action, together with a reasonable attorney's fee as determined by the court.”

15 U.S.C. § 1692k(a) of the FDCPA.

43. As a direct and proximate result of Jefferson Capital **Systems’** violations of the FDCPA, as set forth above, Elisa Perez has suffered annoyance, anxiety, embarrassment, emotional distress, and severe inconvenience.

WHEREFORE, Plaintiff, Elisa Perez, respectfully requests that this Honorable Court enter judgment in their favor and against Defendant, Jefferson Capital Systems, LLC, and enter an award of monetary damages as described herein, not in excess of arbitration limits, including an award for actual damages, statutory damages pursuant to 15 U.S.C. §1692k(a), **costs and attorney’s fees**

pursuant to 15 U.S.C. § 1692k(a), and such other and further relief as this Honorable Court deems just and proper.

JURY TRIAL DEMANDED UPON APPEAL OR REMOVAL.

Respectfully submitted,

J.P. WARD & ASSOCIATES, LLC

Date: October 11, 2021

By: 

Joshua P. Ward (Pa. I.D. No. 320347)

Kyle H. Steenland (Pa. I.D. No. 327786)

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

VERIFICATION

I, JOSHUA P. WARD, ESQ., have read the foregoing COMPLAINT and verify that the statements therein are correct to the best of my personal knowledge, information, and/or belief. I have gained this information from discussions with Plaintiff. This verification is made on behalf of Plaintiff. Plaintiff will produce their verification if/when there is an objection by Defendant or upon directive from the court.

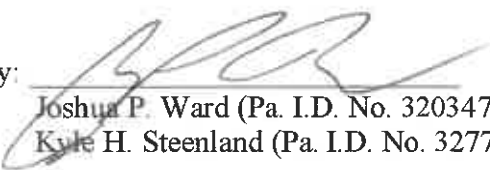
I understand that this verification is made subject to the penalties of 18 Pa. C.S.A. 4904 relating to unsworn falsification to authorities, which provides that if I knowingly make false averments, I may be subject to criminal penalties.

Respectfully submitted,

J.P. WARD & ASSOCIATES, LLC

Date: October 11, 2021

By:


Joshua P. Ward (Pa. I.D. No. 320347)

Kyle H. Steenland (Pa. I.D. No. 327786)

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

EXHIBIT A

Magisterial District Judge 02-1-01**DOCKET**

Docket Number: MJ-02101-CV-0000087-2020

Civil Docket

JEFFERSON CAPITAL SYSTEMS, LLC

v.

Elisa M. Perez

Page 1 of 2

CASE INFORMATION

<u>Judge Assigned:</u>	Magisterial District Judge Adam J. Witkonis	<u>File Date:</u>	09/29/2020
<u>Claim Amount:</u>	\$727.87	<u>Case Status:</u>	Closed
<u>Judgment Amount:</u>		<u>County:</u>	Lancaster

CALENDAR EVENTS

<u>Case Calendar</u>	<u>Schedule</u>			<u>Judge Name</u>	<u>Schedule</u>
<u>Event Type</u>	<u>Start Date</u>	<u>Start Time</u>	<u>Room</u>		<u>Status</u>
Civil Action Hearing	11/06/2020	8:00 am		Magisterial District Judge Adam J. Witkonis	Cancelled
Civil Action Hearing	11/06/2020	8:00 am		Magisterial District Judge Adam J. Witkonis	Continued
Civil Action Hearing	11/23/2020	10:30 am		Magisterial District Judge Adam J. Witkonis	Scheduled
Civil Action Hearing	11/23/2020	10:30 am		Magisterial District Judge Adam J. Witkonis	Cancelled

CASE PARTICIPANTS

<u>Participant Type</u>	<u>Participant Name</u>	<u>Address</u>
Defendant	Perez, Elisa M.	Lancaster, PA 17603
Plaintiff	JEFFERSON CAPITAL SYSTEMS, LLC	Eatontown, NJ 07724

DISPOSITION SUMMARY

<u>Docket Number</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Disposition</u>	<u>Disposition Date</u>
MJ-02101-CV-0000087-2020	JEFFERSON CAPITAL SYSTEMS, LLC	Elisa M. Perez	Judgment for Defendant	11/23/2020

Magisterial District Judge 02-1-01**DOCKET**

Docket Number: MJ-02101-CV-0000087-2020

Civil Docket

JEFFERSON CAPITAL SYSTEMS, LLC

v.

Elisa M. Perez

Page 2 of 2

ATTORNEY INFORMATION**Complainant's Attorney**Name: Bryan Jon Polas, Esq.Representing: JEFFERSON CAPITAL SYSTEMS, LLCCounsel Status: Active - Entry of AppearanceSupreme Court No.: 322175Phone No.: 732-544-9080Address: Law Offices of Hayt, Hayt & Landau, LLC
2 Industrial Way West, P.O. Box 500
Eatontown, NJ 07724Entry of Appearance Filed Dt: 09/29/2020Withdrawal of Entry of Appearance Filed Dt:**Private**Name: Travis Andrew Gordon, Esq.Representing: Perez, Elisa M.Counsel Status: Active - Entry of AppearanceSupreme Court No.: 328314Phone No.: 412-545-3016Address: Law Firm Of Fenters Ward
201 South Highland Ave Suite 201
Pittsburgh, PA 15206Entry of Appearance Filed Dt: 10/28/2020Withdrawal of Entry of Appearance Filed Dt:**DOCKET ENTRY INFORMATION**

<u>Filed Date</u>	<u>Entry</u>	<u>Filer</u>	<u>Applies To</u>
11/23/2020	Judgment for Defendant	Magisterial District Court 02-1-01	Elisa M. Perez, Defendant
10/28/2020	Entry of Appearance Filed	Travis Andrew Gordon, Esq.	Elisa M. Perez, Defendant
10/28/2020	Intent to Defend Filed	Elisa M. Perez	Elisa M. Perez, Defendant
10/21/2020	Certified Civil Complaint Undeliverable	Magisterial District Court 02-1-01	Elisa M. Perez, Defendant
09/30/2020	Certified Civil Complaint Issued	Magisterial District Court 02-1-01	Elisa M. Perez, Defendant
09/29/2020	Entry of Appearance Filed	Bryan Jon Polas, Esq.	JEFFERSON CAPITAL SYSTEMS, LLC, Plaintiff
09/29/2020	Civil Complaint Filed	JEFFERSON CAPITAL SYSTEMS, LLC	

EXHIBIT B



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

JOSHUA WARD, ESQ.

MANAGING PARTNER

412-545-3016 OFFICE
412-540-3399 FAX

October 28, 2020

Jefferson Capital Systems, LLC
c/o Bryan J Polas, Esq.
Hayt, Hayt & Landau, LLC
2 Industrial Way West PO Box 500
Eatontown, NJ 07724

SENT VIA U.S. MAIL

Re: Our Client: Elisa M. Perez
Docket Number: MJ-02101-CV-0000087-2020
Account Number(s):xxx

To Whom It May Concern:

Please accept this letter as confirmation of my representation of **Elisa M. Perez** with a current address of **10 S. Prince St, Apt 508, Lancaster, PA 17603, United States**. My representation of the above-mentioned client includes any related debt(s) and/or credit account(s) your company claims to have, sold, purchased and/or assigned from yourself, another creditor, debt buyer or other entity as of the date of this letter (the "Debts"). **Please cease and desist any further communications with my client as it relates to the collection of Debts.**

According to my client, your company has been reporting the above-referenced accounts to collection and/or credit agencies. My client denies owing **JEFFERSON CAPITAL SYSTEMS, LLC** any amount of money and demands proof of liability, accounting and ownership of these alleged accounts. The proof shall include any agreements and any amendments thereto, any other written or signed documents agreed to by my client, as well as, a complete history of billing statements reflecting how you calculated the current amount claimed, owed, reported to the collection and/or credit agencies and complete copies of any assignment documentation evidencing your ownership rights to the specific accounts.

Pursuant to the Consumer Financial Protection Act (**CFPA**) 12 U.S.C. 5533(a) and the Fair Debt Collection Practices Act (**FDCPA**) 15 U.S.C. § 1692 *et seq.* we request that you provide additional documents related to the Debt you claim is owed by our client:

1. the original account-level documentation reflecting all purchases, payments, or other actual uses of the account;
2. a document signed by our client evidencing the opening of the account forming the basis for the debt;
3. the name of the creditor at the time of charge-off, including the name under which the creditor did business with our client;



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

JOSHUA WARD, ESQ.

MANAGING PARTNER

412-545-3016 OFFICE
412-540-3399 FAX

4. the last four digits of the account number associated with the debt at the time our client's last monthly account statement, or, if not available, at the time of charge-off; the charge-off balance;
5. JEFFERSON CAPITAL SYSTEMS, LLC's method of calculating any amount claimed in excess of the charge-off balance;
6. a copy of the statement where JEFFERSON CAPITAL SYSTEMS, LLC offered to provide our client (within 30 days of a written request) with copies of a document signed by our client evidencing the opening of the account forming the basis for the debt; and the original account-level documentation reflecting a purchase, payment, or other actual use of the account.

Please be advised that at all times relative hereto, we are disputing this debt under the FDCPA, FCRA, FCEUA and/or the UTPCPL. **AS SUCH YOU MUST 1) NOTIFY ANY CRAs YOU HAVE FURNISHED INFORMATION TO THAT THIS TRADE LINE IS DISPUTED; 2) YOU MUST CEASE ALL COLLECTION ATTEMPTS AND DELETE THE TRADE LINE UPON FINAL DISMISSAL OF THE DEBT COLLECTION LAWSUIT IF JUDGMENT IS RENDERED IN FAVOR OF DEFENDANT.** You may direct the requested proof to my office at the address listed above. **YOU HAVE THIRTY (30) DAYS TO PROVIDE THE REQUESTED PROOFS.** All future correspondence or contact shall be directed to my office until my office provides written confirmation of termination of legal representation, if such termination should ever occur. **YOU MUST PROVIDE THIS NOTICE TO ANY ASSIGNEE, TRANSFEREE OR SUBSEQUENT OWNER OF THIS OR ANY DEBT. IF YOU FAIL IN ANY OF THESE REGARDS, YOU WILL BE SUBJECT TO LIABILITY UNDER FEDERAL AND STATE CONSUMER PROTECTION LAWS.**

Very truly yours,

/s/ Travis Gordon

Travis A. Gordon, Esq.
tgordon@fentersward.com
PA Bar I.D.: 328314

TAG/tmn

Cc: Elisa M. Perez

Check type of mail or service

<input type="checkbox"/> Adult Signature Required	<input type="checkbox"/> Priority Mail Express
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail
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<input type="checkbox"/> Priority Mail	

Affix Stamp Here
(for additional copies of this receipt).
Postmark with Date of Receipt.

OCT 28 2020

USPS Tracking/Article Number

Addressee (Name, Street, City, State, & ZIP Code™)

Postage	(Extra Service)	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
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Handling Charge – if Registered and over \$50.00 in value

Additional Signature Required

Adult Scurticide Fertilizer Delivery

Restricted Delivery

Reimbursement	Receipt
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Signature Confirmation

Signature Confirmation Restricted Delivery

Special Handling

4. Elisa Perez
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Entry, accept

Jefferson Chapel, Bryan Foles
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Total Number of Pieces
Listed by Sender

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Postmaster, Per (Name of receiving employee)

PS Form 3877, January 2017 (Page 1 of 2)
PSN 7530-02-000-9098

Complete in Ink

Privacy Notice: For more information on USPS privacy policies, visit usps.com/privacypolicy.

EXHIBIT C

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF Lancaster



**ENTRY OF APPEARANCE
PURSUANT TO PARCPMDJ
207.1(A)**

Mag. Dist. No: 02-1-01
MDJ Name: Honorable Adam J Witkonis
Address: 641 Union Street
Lancaster, PA
17603
Telephone: 717-299-7896

JEFFERSON CAPITAL SYSTEMS,
LLC

v.

ELISA M. PEREZ

Docket No: MJ-02101-CV-0000087-2020
Case Filed: 09/29/2020

TO THE MAGISTERIAL DISTRICT COURT:

Please enter my appearance on behalf of Defendant ELISA M. PEREZ
In the above captioned matter.

Attorney Name: Travis A. Gordon
Supreme Court of Pennsylvania Attorney Identification Number: 328314
Firm Name: The Law Firm of Fenters Ward
Address: 201 South Highland Avenue, Suite 201
City, State, Zip Code: Pittsburgh, Pennsylvania 15206

I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Travis A. Gordon
Signature of Applicant

October 28, 2020
Date



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

JOSHUA WARD, ESQ.

MANAGING PARTNER

412-545-3016 OFFICE
412-540-3399 FAX

October 28, 2020

Magisterial District 02-1-01
Honorable Adam J Witkonis
641 Union Street
Lancaster, PA 17603
Phone: 717-299-7896
Sent via fax: 717-390-2345

RE: MJ-02101-CV-0000087-2020. JEFFERSON CAPITAL SYSTEMS, LLC vs. ELISA M. PEREZ

INTENT TO DEFEND NOTICE:

DEFENDANT INTENDS TO ENTER A DEFENSE. PLEASE CONSIDER THIS NOTICE PER Pa. R. Civ. P. MAG DIST J RULE 305(4)(a).

PLEASE NOTIFY PLAINTIFF THAT DEFENDANT HAS ENTERED NOTICE TO DEFEND PER Pa. R. Civ. P. MAG DIST J RULE 318.

ALSO, PLEASE UPDATE THE DOCKET TO SHOW THAT DEFENDANT INTENDS TO DEFEND AS WELL AS OUR ENTRY OF APPEARANCE.

Very truly yours,

/s/ Travis Gordon

Travis A. Gordon, Esq.
tgordon@fentersward.com
PA Bar I.D.: 328314

TAG/tmn

Cc: Bryan J Polas, Esq.
Elisa M. Perez

EXHIBIT D

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF LANCASTER**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

Mag. Dist. No: MDJ-02-1-01
 MDJ Name: Honorable Adam J. Witkonis
 Address: 641 Union Street
 Lancaster, PA 17603
 Telephone: 717-299-7896

JEFFERSON CAPITAL SYSTEMS, LLC

v.

Elisa M. Perez

Travis Andrew Gordon, Esq.
 Law Firm Of Fenters Ward
 201 South Highland Ave Suite 201
 Pittsburgh, PA 15206

Docket No: MJ-02101-CV-0000087-2020
 Case Filed: 9/29/2020

Disposition Details**Disposition Summary** (cc - Cross Complaint)

<u>Docket No</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Disposition</u>	<u>Disposition Date</u>
MJ-02101-CV-0000087-2020	JEFFERSON CAPITAL SYSTEMS LLC	Elisa M. Perez	Judgment for Defendant	11/23/2020

Comments:

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

11/23/20 *Adam Witkonis*
 Date Magisterial District Judge Witkonis



I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

 Date Magisterial District Judge

RECEIVED
 NOV 30 2020
 BY: _____



JEFFERSON CAPITAL SYSTEMS, LLC

v.

Elisa M. Perez

Docket No.: MJ-02101-CV-0000087-2020

Participant List

Private(s)

Travis Andrew Gordon, Esq.
Law Firm Of Fenters Ward
201 South Highland Ave Suite 201
Pittsburgh, PA 15206

Plaintiff(s)

JEFFERSON CAPITAL SYSTEMS, LLC
c/o Law Offices of Hayt, Hayt, & Landau, LLC
Meridian Center I
2 Industrial Way West
Eatontown, NJ 07724

Defendant(s)

Elisa M. Perez
10 S Prince St Apt 508
Lancaster, PA 17603

Complainant's Attorney(s)

Bryan Jon Polas, Esq.
Law Offices of Hayt, Hayt & Landau, LLC
2 Industrial Way West, P.O. Box 500
Eatontown, NJ 07724





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JOSHUA P. WARD, ESQ.

412.545.3016 OFFICE
412.540.3399 FAX
Info@JPWARD.COM

11/02/2021

SENT VIA U.S. FIRST CLASS MAIL

Rebecca Reynolds
105 Westwind Drive
Moon Township, PA 15108

Re: Authorization for Disclosure of Credit Report / Limited Power of Attorney

Dear Rebecca:

Enclosed, please find an Authorization for Disclosure of Credit Report / Limited Power of Attorney, which upon your approval and completion, will allow us to obtain your free credit reports from Equifax, Experian, and TransUnion. I need this to verify that the plaintiff/creditor is taking the required legal action by updating your credit report appropriately.

Kindly complete the Limited Power of Attorney and return the same to our office in the postmarked, self-addressed envelope provided. If you have any questions or concerns, please do not hesitate to contact me.

Thank you, in advance, for your time and attention to this matter.

Very Truly Yours,

Joshua P Ward, Esq

Joshua P. Ward, Esquire

T: (412) 545-3016

E-mail: jward@jpward.com

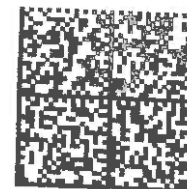
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Jefferson Capital Systems, LLC
16 McLeland Road
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